

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
WILLIAM IRVING,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 05-CV-10054 EFH
	)	
7-ELEVEN, INC. and	)	
THE SOUTHLAND CORPORATION	)	
	)	
Defendants.	)	
_____	)	

**JOINT STATEMENT BY PARTIES**

Pursuant to Rule 16.1(D) of the Local Rules of the United States District Court for the District of Massachusetts, the parties in the above-entitled matter propose the following pre-trial schedule:

**PHASE 1 – DISCOVERY**

Service of requests for production of documents	02/17/06
Service of interrogatories	03/17/06
Responses to all written discovery	04/14/06

**PHASE 2 – DISCOVERY**

Completion of fact depositions (15 per side – not to include keeper of record depositions or depositions by written questions)	08/01/06
Plaintiff's disclosure expert witness reports	09/12/06
Defendants' disclosure expert witness reports	11/01/06

Completion of expert depositions 01/12/07

PHASE 3 – PRETRIAL AND TRIAL

Filing of summary judgment motions 03/02/07

Filing responses to summary judgment 04/06/07

Final pre-trial conference 05/07/07

Trial 06/04/07

The parties do not agree, at this time, to a trial by Magistrate Judge.

Plaintiff,  
WILLIAM IRVING  
By his attorneys,

Defendants,  
7-ELEVEN, INC. and  
THE SOUTHLAND CORPORATION,  
By their attorneys,

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